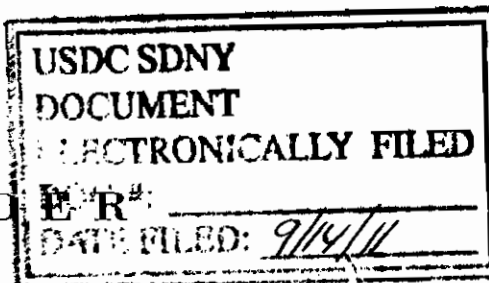


CADWALADER



Cadwalader, Wickersham & Taft LLP
One World Financial Center, New York, NY 10281
Tel +1 212 504 6000 Fax +1 212 504 6666
www.cadwalader.com

New York London Charlotte Washington
Houston Beijing Hong Kong Brussels

September 12, 2011

VIA FACSIMILE 212-857-2346

The Honorable Denny Chin
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: American Society of Media Photographers, et al. v. Google Inc.,
No. 10-CV-2977

Dear Judge Chin:

We write to inform the Court that, as the result of our firm's recent hiring of Julian Perlman from Mishcon de Reya New York LLP and Mr. Perlman's prior representation of plaintiffs in this litigation, our firm is in the process of being retained by the American Society of Media Photographers ("ASMP") as special counsel in connection with ASMP's claims against Google. It is possible that several of the other named plaintiffs may also retain Cadwalader on a similar basis. Although the terms of our engagement have not yet been finalized and we have not yet determined whether we will be appearing for ASMP in this action, we felt it would be advisable to give the Court and counsel notice of our firm's involvement.

Respectfully,

Handwritten signature of Colin A. Underwood in cursive.

Colin A. Underwood

cc: All Counsel of Record (via email)

The Court will address
this issue at the
conference tomorrow.
SO ORDERED.

Handwritten signature of USCJ in cursive.

USCJ

9/14/11